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May 23, 2007

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended (47 U.S.C. 160(c)), for Forbearance from Certain Dominant Carrier Regulation of Its Interstate Access Services, and for Forbearance from Title II Regulation of Its Broadband Services, in the Anchorage, Alaska, Incumbent Local Exchange Carrier Study Area, WC Docket No. 06-109 -- Ex Parte Notice*

Dear Ms. Dortch:

On May 22, 2007, Leonard Steinberg of Alaska Communications Systems Group, Inc. ("ACS"), and Karen Brinkmann, Elizabeth Park and Anne Robinson of Latham & Watkins LLP, met with Ian Dillner, Legal Advisor on Wireline Issues for Chairman Martin, regarding the above-referenced proceeding.

In the meeting, ACS reiterated the need for relief from certain aspects of dominant carrier regulation that ACS sought in its petition. In particular, ACS requested relief to provide certainty with respect to switched access rates, similar to the relief granted to Qwest in Omaha. *See Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Omaha Metropolitan Statistical Area*, Memorandum Opinion and Order, 20 FCC Rcd 19415 ¶¶ 40-41 (2005). Additionally, ACS emphasized the need for flexibility in special access rates given the high levels of competition in Anchorage's business and residential markets. As the Commission has already determined, General Communication, Inc. ("GCI") successfully serves Anchorage's business customers. *See Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as Amended, for Forbearance from Sections 251(c)(3) and 252(d)(1) in the Anchorage Study Area*, Memorandum Opinion and Order, 22 FCC Rcd 1958 ¶ 28 (Jan. 30, 2007). GCI's extensive fiber optic network, for example, ensures that it can offer high-capacity and complex services to businesses. *See, e.g., id.* ¶ 36 & n.121.

ACS noted that GCI is the only party providing service in Alaska that has participated in the forbearance proceeding. GCI's comments focused on its concerns about UNE access in

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Anchorage. This issue is now moot in light of the parties' recent interconnection agreement, which obligates ACS to make UNEs available throughout the Anchorage study area for the near future.

Attached are copies of materials provided to Mr. Dillner at the meeting. Please contact me if you have any questions regarding this submission.

Respectfully submitted,

/s/

Karen Brinkmann

Counsel to ACS of Anchorage, Inc.

Enclosures

cc: Ian Dillner